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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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IN THE MATTER OF THE SEARCH OF )  
RANDY LANSING VIA BUCCAL SWAB ) CASE NO. 2:23mj233-DAO  
)  
)  
)  
) AFFIDAVIT  
)

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**I**

**BACKGROUND AND EXPERIENCE**

I, Jarrod Girod, being duly sworn, depose and state:

1. I am a Special Agent (SA) for the Federal Bureau of Investigation (FBI) assigned to the Salt Lake City Division, Monticello Resident Agency.
2. I have been employed as a Special Agent for the FBI since 2016, and in that capacity am currently assigned to investigate violations of Federal criminal laws, particularly on the Navajo and Ute Indian Reservations. As a Special Agent with the FBI, I have participated in or received training related to the investigation of violent crimes, fugitive investigations, and other criminal matters. I have conducted many search warrants and led multiple investigations related to crimes of violence.
3. As a Federal agent, your affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
4. I am currently involved with an investigation into the death of VICTIM A as the result

of an assault by RANDY LANSING ("RANDY"). The assault of VICTIM A by RANDY resulted in the death of VICTIM A in violation of the SUBJECT OFFENSES 18 U.S.C. 1111 and 1153.

5. This affidavit is being submitted for the purpose of securing a search warrant and I have not included each and every fact known to the investigative agent. I have set forth only those facts that I believe are necessary and adequate to establish probable cause for a search warrant.

6. As a result of your affiant's personal participation in this investigation and reports made to your affiant by witnesses and concerned parties, your affiant is familiar with the circumstances of the offenses described in this Affidavit. On the basis of this familiarity, your affiant alleges that facts contained in the Affidavit show that:

## II

### **PURPOSE OF AFFIDAVIT**

7. The purpose for this affidavit is to support an application to the Court for a search warrant for the following:

- a) DNA to be collected via buccal swab from Randy Lansing

## III

### **FACTS ESTABLISHING PROBABLE CAUSE**

9. On April 23<sup>rd</sup>, 2022, your affiant was notified of an individual that had possibly drown in a river on the Navajo Nation Indian Reservation near Aneth, Utah. The victim, VICTIM A, was transported to Blue Mountain Hospital where she was pronounced deceased. Navajo Police provided your affiant with the initial information that VICTIM A had fell from a cliff into the river and had drown.

10. On April 24<sup>th</sup>, 2022, your affiant met with San Juan County Sheriff Deputy Jon Laws who is also a medical examiner assistant investigator. Deputy Laws and your affiant viewed the body of VICTIM A and observed numerous injuries to VICTIM A'S face that did not appear consistent with a drowning. Your affiant then interviewed L.L. the mother of RANDY. L.L. advised she was at RANDY'S residence on the evening of April 23<sup>rd</sup> when RANDY drove his vehicle back to his residence. RANDY told L.L. that VICTIM A had gone swimming and drowned in the creek. L.L. advised that RANDY and VICTIM A had been at the creek that is to the east of RANDY's residence. When RANDY arrived back at his residence, VICTIM A had been placed in the back seat. L.L. then drove VICTIM A to a residence in Aneth, Utah where L.L. attempted to get help for VICTIM A. L.L. stated that RANDY accompanied her to Aneth, but immediately went to L.L.'s residence because he was wet and cold. K.B., an Emergency Medical Technician, advised that VICTIM A was folded into the back seat and had numerous injuries. VICTIM A was also completely naked and none of her clothing was located in the vehicle. K.B. attempted CPR while waiting for the ambulance to arrive. K.B. did not see RANDY arrive with L.L. RANDY'S 17-year-old daughter, ("B.L.") was interviewed and advised she did not see RANDY on the night of Saturday April 23<sup>rd</sup>. B.L also indicated that RANDY did not keep any clothing or have access to the residence located at #24 NHA housing in Aneth, Utah. B.L. traveled to RANDY's residence on the morning of Sunday April 24<sup>th</sup> with L.L. B.L. spoke with RANDY who was at the residence. RANDY told L.L. that VICTIM A had gone into the creek and fell and hit her head and drown. RANDY stated VICTIM A also stripped her clothes off and VICTIM A'S clothes were washed down the creek.

11. On April 25<sup>th</sup>, 2022, your affiant located an area approximately one mile east of RANDY's residence that offered access to McElmo Creek. The water in McElmo Creek was

approximately 8 inches deep. Tire and shoe impressions were located in the area of the creek. Located near the tire impressions was an area in which a red blood-like substance was located and had been attempted to be covered up by putting sand and dirt on top of it. The shoe impressions appeared to have a waffle pattern tread. Your affiant did not locate any clothing at this potential scene.

12. On April 25<sup>th</sup>, 2022, your affiant spoke with Assistant Medical Examiner who conducted an autopsy of VICTIM A and stated VICTIM A's cause of death was homicidal drowning. The medical examiner observed multiple traumatic injuries in locations and patterns that did not support a fall. VICTIM A had facial trauma and neck trauma indicative of blunt force injury. VICTIM A also had a broken hyoid bone that is commonly seen in strangulation. The medical examiner advised that the multiple points of impact were indicative of an assault. VICTIM A also had pattern injury to her back that left a shoe impression. The medical examiner advised this pattern injury was likely caused by someone stomping or standing on VICTIM A'S back with a waffle pattern tread shoe.

14. Several beer cans were collected from the scene near McElmo Creek. Evidence item 1B4, Can From Along McElmo Creek, was sent to the FBI Laboratory for testing. A swab from the mouth of the can was tested for DNA and the results were run through the CODIS database. A match for the DNA swabbed from the mouth of the can was obtained with a federal convicted offender identified as Randy Lansing. The FBI Laboratory requires a buccal swab from Randy Lansing to confirm the match to the DNA found on the mouth of the can.

#### IV

#### **ITEM TO BE SEIZED – ATTACHMENT B**

15. Based on the foregoing, I respectfully submit that there is probable cause to believe that violations of 18 U.S.C. § 1111 and 1153 have occurred and the item as described in Attachment B constitutes evidence of these violations and will be found on the person of RANDY LANSING located in the custody of the U.S. Marshals in Utah.

V

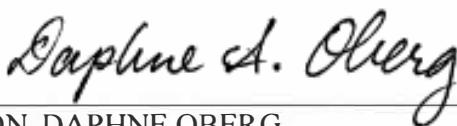
**CONCLUSION**

15. Based on the foregoing, my training and experience, and discussions with other law enforcement agents, I believe that there is probable cause to conclude that the item to be seized in Attachment B constitutes evidence of the SUBJECT OFFENSES.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge and belief.

  
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Jarrod Girod  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on this 15th day of March, 2023.

  
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HON. DAPHNE OBERG  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF UTAH

**ATTACHMENT A**

**LOCATION TO BE SEARCHED**

The location to be searched is located, described, and depicted as follows:

Randy Lansing, date of birth December 27, 1983, currently incarcerated at the Tooele County Detention Facility located at 1960 S Main St, Tooele, UT 84074

**ATTACHMENT B  
ITEMS TO BE SEIZED AND SEARCHED**

This warrant authorizes the seizure of the items, fruits, instrumentalities or evidence listed below for evidence of violations of 18 U.S.C. §1111 and 1153. This warrant further authorizes the use of restraints by law enforcement, if necessary, to seize the item(s) listed below:

1. DNA from Randy Lansing utilizing buccal swabs. The buccal swabs will be used to collect DNA from the saliva in the mouth of Randy Lansing.

